

Exhibit 42

Excerpts of deposition of Jinx Strange (Paul Millirons)
(December 7, 2023)

United State District Court
Southern District of New York

The Satanic Temple, Inc.

Plaintiff,

1:22-CV-01343-MKV

v.

Newsweek Digital, LLC,

Defendant.

DEPOSITION OF PAUL MILLIRONS

DECEMBER 7, 2023

10:00 a.m.

File # MW 6345272

COURT REPORTER: Christina DeGrande

1 APPEARANCES:

2 On Behalf of The Satanic Temple, Inc.

3 Matthew Kezhaya, Esq.

4 Sonia Kezhaya, Esq.

5 150 South 5th Street, Suite 1850

6 Minneapolis, Minnesota 55401

7 Matt@kezhaya.law

8 Sonia@kezhaya.law

10
11 On Behalf of Newsweek:

12 Sara Tesoriero, Esq.

13 Cameron Stracher

14 51 Astor Place, 9th Floor

15 New York, New York 10003

16 Sara@stracherlaw.com

17
18 On Behalf of Paul Millions:

19 Brian Spahn, Esq.

20 Godfrey and Khan

21 833 E. Michigan Street, Suite 1800

22 Milwaukee, Wisconsin 55302

23 Bspahn@gklaw.com

I N D E X

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PAUL MILLIRONS	DIRECT	8
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E X H I B I T S

NUMBER	DESCRIPTION	MARKED
Exhibit 1	Newsweek Article	9
Exhibit 2	October 24, Email	12

1 BE IT REMEMBERED that the deposition upon
2 oral examination of Paul Millirons was taken on
3 December 7, 2023, at 10:00 a.m., via Zoom remote
4 technology before Christina DeGrande, Professional
5 Stenographer, Notary Public in and for the State of
6 Minnesota.

7 Whereupon, the following proceedings were
8 had, to wit:

9 THE VIDEOGRAPHER: Good morning. We're
10 going on the record at 10:02 a.m. on
11 December 7th, 2023. Please note, this
12 deposition is being conducted virtually.
13 Quality of recording depends on camera and
14 internet connection of participants. What
15 is seen from the witness and heard on the
16 screen is what will be recorded. Audio and
17 video recording will continue to take place
18 unless all parties agree to go off the
19 record.

20 This is Media Unit 1 of the
21 video-recorded deposition of Paul Millirons
22 taken by counsel for the plaintiffs in the
23 matter of the -- the Satanic Temple,
24 Incorporated versus Newsweek Digital, LLC,
25 filed in the United States District Court,

1 Southern District of New York, case
2 1:22-CV-01343-MKV.

3 My name is Dave Young. I'm the
4 videographer. Our court reporter today is
5 Christina DeGrande. We are both
6 representing Veritext Legal Solutions. I am
7 not related in -- to any party in this
8 action nor am I financially interested in
9 the outcome.

10 If there are any objections to this
11 proceeding, please state them at the time of
12 your appearance. Will counsel now state
13 their appearances and affiliations for the
14 record beginning with the noticing attorney?

15 MR. KEZHAYA: Matt Kezhaya joined by
16 Sonia Kezhaya for the plaintiff.

17 MS. TESORIERO: This is Sara Tesoriero
18 for the defendant Newsweek.

19 MR. SPAHN: This is Brian Spahn for the
20 witness, Paul Millirons.

21 THE VIDEOGRAPHER: And will the court
22 reporter please swear in the witness, and
23 then we can proceed?

24 THE COURT REPORTER: Counsel, I have a
25 short statement I would like to make first

1 to help everything go as smoothly as
2 possible.

3 Because we are all appearing remotely,
4 I would like to ask everyone to be more
5 conscious than ever of not speaking over one
6 another. If I cannot hear the end of a
7 question or the beginning of an answer, you
8 are going to have a poor record.

9 If the witness could take a pause
10 before answering to allow the attorneys to
11 object, this will be extremely helpful. I
12 don't want to disrupt the flow of your
13 proceedings and will try to keep
14 interruptions to a minimum, but I will
15 interrupt if I cannot hear or understand
16 something that is said. If I do interrupt,
17 please be patient and understand my goal is
18 to provide you with a clear record of the
19 proceedings.

20 Before we get started, I would request
21 that you move your papers and/or legal pads
22 away from your phones or microphones to
23 avoid distracting ambient noise.

24 I will swear in the witness, but before
25 doing so, I need a stipulation to allow me

1 to swear him remotely. I will read the
2 stipulation into the record followed by each
3 attorney stating their appearances -- well,
4 you already did that so you don't need to do
5 that again -- and anyone else in the room
6 who is also attending and then note your
7 stipulation allowing me to swear the witness
8 remotely starting with the taking attorney.

9 Due to the need for this proceeding to
10 take place remotely, the parties do
11 stipulate that the court reporter may swear
12 in the witness via Zoom remote technology
13 and that the witness has verified that he
14 is, in fact, Paul Millirons.

15 MR. KEZHAYA: Yes, so stipulated from
16 plaintiff's end.

17 MS. TESORIERO: So stipulated for the
18 defendant.

19 MR. SPAHN: So stipulated for the
20 witness.

21 THE COURT REPORTER: Please raise your
22 right hand.

23 Do you swear or affirm that the
24 testimony you are about to provide for the
25 cause under consideration will be the truth

1 and the whole truth, so help you?

2 THE WITNESS: I do.

3 MS. TESORIERO: Matt, before you begin,
4 would you agree to the stipulation we did in
5 other depositions that if I make an
6 objection, it can be preserved as to
7 witness's counsel and vice versa?

8 MR. KEZHAYA: Correct. So stipulated.

9 Any other pre-proceeding matters?

10 MS. TESORIERO: Not from me.

11 MR. SPAHN: Not from me.

12

13 PAUL MILLIRONS,
14 a witness in the above-entitled action,
15 after having been first duly sworn,
16 testifies and says as follows:

17

18 DIRECT EXAMINATION

19 BY MR. KEZHAYA:

20 Q. Okay. Please state your preferred name for the
21 record?

22 A. My preferred name is Jinx Strange.

23 Q. And that's a pseudonym; is that correct?

24 A. Correct.

25 Q. Okay. Are you familiar with the article, "Orgies,

1 ways that were more than anecdotal"?

2 A. I'm sorry. What do you mean? What about it?

3 Q. I'm -- I'm asking what that -- what that meant in
4 your mind when you wrote this quote.

5 A. Okay.

6 Q. So what did you mean when you --

7 A. The context was that Julia had asked what were some
8 -- what were -- what were some of the reasons that I
9 was not involved with TST or had -- had left the
10 organization, and that was part of a list of things
11 that concerned me. When I say, "Covered up in ways
12 that are more anecdotal," I'm referring specifically
13 to observed behavior on social media by people I
14 understand to be leaders in TST. I think there were
15 chapters at the time.

16 Q. So is it -- is it accurate to say that you
17 personally witnessed this sexual abuse?

18 A. No.

19 Q. Okay. So you didn't personally witness any sexual
20 abuse?

21 A. No.

22 Q. What about this coverup? You -- is it accurate to
23 say you personally observed the coverup?

24 A. I observed behavior that I thought would -- it was
25 suspicious in the context of allegations that were

1 Q. Okay. Is it fair to say that your understanding of
2 sexual abuse was secondhand through people basically
3 telling you something over the internet?

4 A. Yes.

5 Q. Okay. Your next sentence says, "A lot of times,
6 those things were anecdotal or unsupported, but
7 sometimes they were concerning." Is that accurate
8 reading of your -- of your email?

9 A. Yes.

10 Q. Okay. When you say that they were anecdotal or
11 unsupported, what did that mean as -- as the person
12 drafting this statement?

13 A. That meant that there was no other context or
14 anything I could observe related to the claim that
15 was being made.

16 Q. So my interpretation of this sentence here is that a
17 lot of times, they were anecdotal or unsupported
18 suggesting that sometimes they were not. Is that --
19 is that a correct reading?

20 A. Yes.

21 Q. Okay. So I want to turn, now, to what you're
22 getting at with -- with regard to when they are more
23 than anecdotal or they are supported.

24 A. Okay.

25 Q. What were -- who were some of the people who made

STATE OF MINNESOTA)
) ss

COUNTY OF ANOKA)

BE IT KNOWN THAT I, Christina M. De Grande,
the undersigned professional stenographic court
reporter took the proceedings on December 7, 2023.

I do hereby certify that I was then and there a
notary public in and for the County of Anoka, State
of Minnesota, and by virtue thereof, I am duly
authorized to administer an oath;

That before testifying, the witnesses were first duly sworn under oath by me to testify to the whole truth relative to the cause under consideration.

The foregoing 32 pages are a true and accurate copy of my original stenotype notes as transcribed by computer-aided transcription taken relative to the aforementioned matter.

I am not related to any of the parties hereto
nor am I interested in the outcome of the action.

WITNESS MY HAND AND SEAL this 18th day of

December 2023

Christina BeHandel

CHRISTINA M. DE GRANDE
Professional Stenographic Court Reporter
And Notary Public
Commission expires January 31, 2027